

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,

Plaintiff,

v.

Universal Protection Service, LP,
d/b/a Allied Universal Security
Services

Defendant.

§ CIVIL ACTION NO. 4:23-cv-02823

§ Jury Trial Demanded

§
§
§
§
§

**PLAINTIFF TWANA AHMED'S OBJECTIONS
TO DEFENDANT'S WITNESS LIST**

1. objection to unnamed, unidentified witnesses

Twana Ahmed objects to Defendant's designation of "any witness" necessary for foundation or impeachment. *See ECF No. 47, p. 7.* Defendant does not name or otherwise identify any particular witness. *Id.* This does not provide fair notice for trial preparation for witness testimony.

2. objection to overly broad testimonial topic

Twana Ahmed objects to Defendant's stated testimonial topic: "allegations contained within the operative complaint." *See ECF No. 47, pp. 1-6.* The stated testimonial topic is overly broad and does not provide fair notice for trial preparation of each witness. Alternatively, Mr. Ahmed requests that all parties get the same broad leeway in designating testimony topics.

3. objection to defendant's failure to identify witnesses it *will* call and *may* call

Twana Ahmed objects to Defendant's failure to identify witnesses it *will* call at trial versus witnesses it *may* call at trial. *See ECF No. 47.* This does not provide fair notice for trial preparation for witness testimony, and violates the Court's Joint Pretrial Order procedures. *See ECF Doc. 3-1, ECF p. 27.*

Respectfully submitted,

/s/Amanda C. Hernandez

Amanda C. Hernandez
Attorney-in-charge
Texas State Bar No. 24064411
Southern District Bar No. 1531045

AH Law, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057
T: (713) 588-4359
F: (281) 572-5370
amanda@ahfirm.com

and

Amy E. Gibson
Of Counsel
Texas State Bar No. 00793801
Southern District Bar No. 20147
amy@gwfirm.com

David L. Wiley
Of Counsel
Texas State Bar No. 24029901
Southern District Bar No. 34134
david@gwfirm.com

Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923
T: (214) 522-2121
F: (214) 522-2126

Attorneys for Twana Ahmed

CERTIFICATE OF SERVICE

The undersigned certifies that on May 9, 2025, *Plaintiff Twana Ahmed's Objections to Defendant's Witness List* was filed via the Court's CM/ECF system, thereby automatically serving Defendant's attorneys of record.

/s/Amanda C. Hernandez
Amanda C. Hernandez